

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HUGHES RIVER FM, LLC,  
a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,  
a Cayman Islands corporation,  
YU JIANJUN, an individual,  
SEAMAN YU, an individual,  
XIAOYU CHEN, an individual,  
LI HAIBO, an individual,  
and TENCENT MUSIC ENTERTAINMENT  
GROUP, INC., a Cayman Islands  
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that on Thursday, September 4, 2025 at 8:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Edmund E. Chang, or any judge sitting in his stead, in Courtroom 2341, in the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604, and then and there present **DEFENDANT XIMALAYA, INC.'S MOTION TO DISMISS THE AMENDED COMPLAINT**, a copy of which is attached and hereby served upon you. Defendant Ximalaya, Inc. has conferred with Plaintiff Hughes River FM, LLC and the Motion will be contested.

Dated: August 27, 2025

RESPECTFULLY SUBMITTED,

Defendant Ximalaya, Inc.

By: /s/ Vincent Filardo, Jr.  
Vincent Filardo, Jr. (*pro hac vice pending*)  
Andrew Sklar (*pro hac vice pending*)  
Yi He (*pro hac vice pending*)  
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*Counsel for Defendant Ximalaya, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on August 27, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filings to all registered users.

Dated: August 27, 2025

/s/ Vincent Filardo, Jr.

Vincent Filardo, Jr.